



JAE LEE <jae@lawjsl.com>

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## PARK, MINYE V. DAVID DENNIS KIM, M.D.

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Newman, Hayley B. <hnewman@hpmb.com>

Fri, Sep 17, 2021 at 2:58 PM

To: JAE LEE <jae@lawjsl.com>, Celine Frank <celine.frank@lexitaslegal.com>

Cc: "McDermott, Linda" <lmcdermott@hpmb.com>, NY Tri-State Video Conference <nyvideoconference@lexitaslegal.com>

Ms. Lee,

We have to conduct the deposition during the Court's business hours in the event that we have an issue that requires a phone call to chambers. The hours you suggest do not align with the Court's hours. She chose to file a lawsuit in the United States and your client was directed by the Court to make herself available for the deposition. I can agree to start at 9:30 a.m., if the reporter and interpreter are available, and we are entitled to take her deposition for 7 hours under the federal rules, as you are well aware.

Thank you,

Hayley Newman

Partner

Heidell, Pittoni, Murphy & Bach

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**From:** JAE LEE <jae@lawjsl.com>  
**Sent:** Friday, September 17, 2021 2:47 PM  
**To:** Celine Frank <celine.frank@lexitaslegal.com>

**Cc:** Newman, Hayley B. <[hnewman@hpmb.com](mailto:hnewman@hpmb.com)>; McDermott, Linda <[lmcdermott@hpmb.com](mailto:lmcdermott@hpmb.com)>; NY Tri-State Video Conference <[nyvideoconference@lexitaslegal.com](mailto:nyvideoconference@lexitaslegal.com)>  
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